

EXHIBIT D

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

--oOo--

MIGUEL A. CRUZ, and John
D. Hansen, individually
and on behalf of all
others similarly
situated,

Plaintiffs,

Case No. C07-02050 SC

vs.

DOLLAR TREE STORES, INC.,

Defendant.

DEPOSITION OF JOHN D. HANSEN

DATE: THURSDAY, OCTOBER 11, 2007

TIME: 10:05 a.m.

LOCATION: Kauff, McClain & McGuire
One Post Street, Suite 2600
San Francisco, California

PREFERRED REPORTERS
Certified Shorthand Reporters
201 E. Watmaugh Road
Sonoma, California 95476
707-938-9227

REPORTED BY: Wendy L. Van Meerbeke, CSR #3676

1 you know, before that happened, that -- so that's

2 how I ended up with the two.

3 Q. It was your decision to discharge

4 Ms. Baas; correct?

5 A. Yes. Well, of course, I had counseling

6 from -- what was her name? Candace Camp and Rick.

7 Q. Ms. Camp was and is a regional human

8 resource person; correct?

9 A. Yes.

10 Q. Was it your practice, when you were

11 discharging an employee at your store, to consult

12 with Ms. Camp?

13 A. Yes.

14 Q. Is it correct that that consultation

15 consisted of you telling Ms. Camp what the

16 performance problems were and Ms. Camp saying, "I

17 think your decision to terminate is appropriate"?

18 A. Correct.

19 Q. Did Ms. Camp ever come down to the store

20 and do an independent investigation with respect to

21 your reasonings?

22 A. No. I don't believe she has ever been to

23 the store.

24 Q. So she has never been to the store for any

25 reason; is that right?

1 Q. Briefly, what were Ms. Baas' performance
2 issues?

3 A. Just tasks that I asked her to do weren't
4 getting done. The closing procedures weren't 100
5 percent followed. There were a couple that I just
6 can't recall right now.

7 We had had an incident in a meeting -- oh,
8 yeah. Actually, the main reasons -- now I
9 remember -- is the way she was interacting with
10 customers, the way she was interacting with her
11 associates, including myself.

12 Q. Was it part of your job responsibility to
13 evaluate how Ms. Baas interacted with customers?

14 A. I would -- yeah. I was in charge of the
15 store, so, yes -- I would say yes.

16 Q. Was it part of your job responsibility to
17 counsel Ms. Baas with respect to a better way to
18 interact with customers?

19 A. Yes, definitely.

20 Q. At some point in time, did you say to
21 Ms. Baas, "If you don't correct this problem, I'm
22 going to have to terminate your employment"?

23 A. To be honest, I don't think I ever
24 actually said that.

25 Q. Did you give her warning notices --

1 A. Yes.

2 Q. -- that she needed to improve?

3 A. Uh-huh.

4 Q. Yes?

5 A. Yes.

6 Q. You said that Ms. Baas was not following

7 closing procedures that you required. What were

8 those procedures?

9 A. Just like making sure that the end caps

10 were clean and things like that, mostly the

11 cleanliness of the store. That was the procedures

12 I was upset about.

13 Q. Would you give her direction in that

14 regard?

15 A. Yes. I actually would come in and close

16 with her a couple times and show her, you know, the

17 way I would do things.

18 Q. Did you view that as a training session

19 with her?

20 A. Uh-huh.

21 Q. Yes?

22 A. Yes. Another one in the jar.

23 Q. What were Ms. Lofquist's performance

24 deficiencies?

25 A. A little of the same. I didn't really

1 A. Yeah.

2 Q. For disciplinary reasons?

3 A. Uh-huh.

4 Q. Yes?

5 A. Yes. Sorry.

6 MS. McCLAIN: May I have this marked as
7 next in order, please?

8 (A document was marked as Exhibit 28
9 for identification.)

10 MS. McCLAIN:

11 Q. Is this the effective notice for
12 termination?

13 A. Oh, no. This was just another -- it looks
14 like around the exact same time, so maybe I had
15 like three or four ready for her.

16 Q. So this again is a warning notice to
17 Ms. Lofquist based upon her not following your
18 direction; is that right?

19 A. Yeah.

20 Q. You made the decision to issue this
21 warning notice?

22 A. Uh-huh.

23 Q. Yes?

24 A. Yes.

25 Q. How would you describe the reasons for

1 Ms. Lofquist's termination? Your recommendation

2 that she be terminated.

3 A. Um, mostly the attendance, um, not showing

4 up enough and, um, not showing up on time.

5 Q. Did you ever ask her what her problem was?

6 A. Well, towards the end, she moved to

7 Lakeport, which was an hour, at least, I think,

8 drive, and so I'm sure that was a problem.

9 Q. You don't recall ever specifically asking

10 her, but you knew that that was a factor or you

11 thought that was a factor; is that right?

12 A. I never asked. I just said, you know --

13 you know, I just made sure she knew that it was

14 starting to get on my nerves.

15 Q. Did you advise both Ms. Bassignani and

16 Ms. Lofquist of their terminations? Did you tell

17 them?

18 A. What do you mean?

19 Q. Did you call them and say, "You're fired"?

20 A. Yes. Kassondra -- I believe she was off

21 that week or something. I can't remember exactly

22 what it was.

23 And all of a sudden, the -- I was supposed

24 to do it the next day when she was supposed to show

25 up, but she -- she didn't get her check. She was

- 1 Q. Did Mr. Tellstrom ever direct you to
2 change an employee's punches to avoid overtime?
- 3 A. I don't recall whether he did or not.
- 4 Q. And he certainly didn't do it very often
5 under any circumstance because you only did this
6 once; correct?
- 7 A. Correct. Um, I didn't have a whole lot of
8 issues with it and so I don't think it was
9 something that -- you know, it wasn't something
10 that was recurring.
- 11 Q. You didn't have a lot of issues with
12 overtime because you scheduled your employees
13 correctly?
- 14 A. Correct.
- 15 Q. And they didn't work overtime,
16 necessarily?
- 17 A. Uh-huh.
- 18 Q. And you understood that if somebody did
19 work overtime, the way to handle it was to say,
20 "Please don't do that. We're going to pay you, but
21 please don't do that"; correct?
- 22 A. Correct.
- 23 Q. You have no current recollection that you
24 can tell me of a day, place and time when
25 Mr. Tellstrom said to you, "Alter time records"; is

1 that right?

2 A. That's correct.

3 Q. Did any other Dollar Tree manager ever say
4 to you in any fashion, "Alter time records"?

5 A. Not to me. No.

6 Q. When you reviewed 1868 punches -- which
7 you're doing online; correct?

8 A. Uh-huh.

9 Q. Yes?

10 A. Yes.

11 Q. Did you do so to make sure that people had
12 punched in and out correctly? Did you have any
13 other purpose other than to make sure that the
14 punches correctly reflected what they were doing?

15 A. No. That was exactly what I was doing.

16 Q. With the goal being that they were paid
17 for all time worked?

18 A. Correct. That the punches that they
19 entered were correct and that, you know -- that if
20 they left one off, it was -- it was either I'd have
21 to ask them directly or have it documented of when
22 they signed in and out. And even if I asked them,
23 I would ask somebody else to double-check.

24 Q. So you wanted to get the time accurate; is
25 that right?

1 A. Correct.

2 Q. And was there ever a case when an employee

3 forgot to punch in and out for lunch, for example?

4 Did that happen?

5 A. It happened all the time. Yeah.

6 Q. And did that mean they didn't take the

7 lunch or just meant they forgot to punch in and

8 out?

9 A. Um, most of the time they just forgot to

10 punch in and out.

11 Q. Do you recall any instance where someone

12 didn't take the lunch?

13 A. Um, no, not necessarily.

14 Q. When you were reviewing time records, you

15 were often doing them the next day, right, or maybe

16 even a couple of days later?

17 A. Yeah. If I wasn't -- if there was some

18 left over from the next day and they weren't fixed,

19 yes, I would do them.

20 Q. So you're sitting at the computer and you

21 see that Vickie doesn't have a punch-out or back in

22 for lunch, for example?

23 A. Okay.

24 Q. That happened maybe not with Vickie, but

25 that happened; is that right?

1 once.

2 A. Counsel -- I honestly --

3 MR. FIETZ: Don't say anything about --

4 I'll move to strike that testimony.

5 MS. McCLAIN:

6 Q. You don't have to tell me what, um -- what

7 transpired. The fact of the matter is --

8 A. It was --

9 Q. Hang on.

10 A. Okay. Go ahead.

11 Q. The fact of the matter is that you had an

12 opportunity to speak with your counsel in that time

13 frame; correct?

14 A. Correct.

15 Q. Um, and as you sit here today, can you

16 really tell me whether it was none, one, two or

17 three?

18 A. Um, I can't tell you how many times. No.

19 I honestly -- and then it was more of -- because

20 I -- because it could have been more than once, and

21 I don't remember. I don't remember. To be

22 truthful and honest, there's not -- I don't think

23 there's any way I could remember how many times.

24 Q. You didn't keep a record of it?

25 A. Oh, absolutely not.

1 Q. And, um you're -- you're certain it was
2 limited, though? We're not talking about more than
3 two or three?

4 A. No.

5 MR. FIETZ: Objection. Lacks foundation.

6 THE WITNESS: I'm not exactly sure, to be
7 honest, how many times I did it. I remember there
8 was a short period of time that I felt very
9 pressured and some of the stuff was happening. And
10 that's all I can remember. So that's all I figure.
11 It's a very limited amount of time that I did it.

12 MS. McCLAIN:

13 Q. And it was your decision to handle the
14 pressure in that fashion; wasn't it?

15 A. It was my decision?

16 Q. It was your decision to handle whatever
17 pressure you were feeling by making that change, no
18 one else's?

19 A. No one else's. No.

20 Q. Correct?

21 A. Correct.

22 Q. Thank you. Good. We'll see you the
23 beginning of November. Your counsel and I will be
24 talking about scheduling before then.

25 A. Okay.

1 CERTIFICATION OF DEPOSITION OFFICER

2 I, WENDY L. VAN MEERBEKE, duly authorized to
3 administer oaths pursuant to Section 2093(b) of the
4 California Code of Civil Procedure, do hereby
5 certify that the witness in the foregoing
6 deposition was duly sworn by me to testify to the
7 truth in the within entitled cause; that said
8 deposition was taken at the time and place set
9 forth; that the testimony of said witness was
10 reported by me, a Certified Shorthand Reporter and
11 a disinterested person, and was thereafter
12 transcribed by computer under my direction into
13 booklet form; that the witness was given an
14 opportunity to read and correct said deposition and
15 to subscribe to the same.

16 I further certify that I am not of counsel or
17 attorney for either or any of the parties in the
18 foregoing deposition and caption named, nor in any
19 way interested in the outcome of the cause named in
20 said caption.

21 Dated the 1st day of November, 2007.

22 

23 WENDY L. VAN MEERBEKE, CSR 3676
24
25

Preferred Reporters
201 E. Watmaugh Road
Sonoma, California 95476
707-938-9227

October 27, 2007

TO: John D. Hansen
c/o Jeremy R. Fietz, Esq.
Santa Rosa, CA 95401

Re: Cruz v. Dollar Tree Stores
Deposition taken on October 11, 2007
Reported by Wendy Van Meerbeke, CSR #3676

Dear Mr. Hansen,

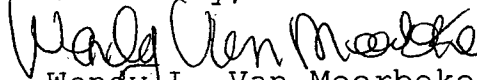
The original transcript of your deposition taken in the above-entitled action has been prepared and is available at this office for your reading, correcting and signing.

You may wish to discuss this matter with your attorney to determine if counsel requires that the original transcript of your deposition be read, corrected and signed by you before it is sealed.

Your rights regarding signature of this deposition are contained in the California Code of Civil Procedure.

If you wish to make arrangements to review the original transcript of your deposition, please contact this office during office hours, 9:00 to 5:00 Monday through Friday, to make an appointment to review the original transcript.

Sincerely,



Wendy L. Van Meerbeke
Certified Shorthand Reporter

cc: All Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MIGUEL A. CRUZ, and JOHN D.)
HANSEN, individually, and on)
behalf of all others similarly)
situated,)
)
Plaintiffs,)
)
vs.) Case No: C07-02050 SC
)
)
DOLLAR TREE STORES, INC.,)
)
Defendant.)
_____)

DEPOSITION OF JOHN D. HANSEN
VOLUME II

DATE: Thursday, November 1, 2007
TIME: 9:32 a.m.
LOCATION: Kauff, McClain & McGuire
One Post Street, 26th Floor
San Francisco, California 94104

PREFERRED REPORTERS
Certified Shorthand Reporters
201 E. Watmaugh Road
Sonoma, California 95476
707-938-9227

Reported By: Linda Vaccarezza, RPR, CSR #10201

1 violation of Dollar Tree policy for family 03:

2 members to work in the same store? 03:

3 A Yes. I think at the time he applied, I 03:

4 didn't realize it was her son. And, you know, so 03:

5 they weren't working together, you know, after 03:

6 that. I think he only worked there a couple of 03:

7 days. So, yeah. 03:

8 Q During that time when those extra people 03:

9 were there for a few days, did you ever work in 03:

10 the middle of the night? 03:

11 A Oh, I was there the whole time. Yeah. 03:

12 Q During the time when you were working in 03:

13 the middle of the night and Kelly Lofquist's son 03:

14 was working in the middle of the night, was 03:

15 Ms. Lofquist, to your observation, ever working 03:

16 in the middle of the night? 03:

17 A I don't recall if she was there that 03:

18 night. I know that there was some -- there was a 03:

19 time that she worked in the middle of the night. 03:

20 I don't remember if it was the same time that I 03:

21 had her son. I thought -- I thought she came and 03:

22 picked him up. That was about it. 03:

23 Q How did it happen that Ms. Lofquist was 03:

24 working in the middle of the night on one 03:

25 occasion? 03:

1 A We just needed as much help as we could 03:

2 get, so. 03:

3 Q Did she volunteer? 03:

4 A I think I asked her. And she said she 03:

5 would do it. Yeah. It was a way to get more 03:

6 hours. 03:

7 Q Did you pay her for that time? 03:

8 A Yeah. Yeah. 03:

9 Q Did you tell her to punch in and 03:

10 carefully clock her time, make sure she got paid? 03:

11 A As far as I remember. I don't remember 03:

12 ever not telling her -- as far as I know, it was 03:

13 her. I never asked anybody to come in and not -- 03:

14 work off the clock. So I don't remember -- you 03:

15 know, come in, punch the clock, and go to work. 03:

16 That's all I remember. 03:

17 Q Did you ever kind of wink at somebody; 03:

18 say, you know, we all need to be on the clock but 03:

19 I'm not looking if you're not on clock. Do you 03:

20 understand the question? 03:

21 Did you ever pretend like you wanted 03:

22 people to work on the clock but knew that they 03:

23 were not working on the clock, employees at store 03:

24 1868? 03:

25 A No. I -- I don't recall -- I mean, I 03:

1 11:03, and you changed the clock out to 11:33, 06:

2 correct? 06:

3 A Correct. 06:

4 Q Do you know why you did that? 06:

5 A No. 06:

6 Q Was it because she was in error and 06:

7 really worked until 23:33? 06:

8 A I can only speculate. I don't know. 06:

9 Q Over and over again you've said to me, I 06:

10 cannot look at these Audit Trail Reports and tell 06:

11 you whether the change was legitimate or 06:

12 illegitimate and I really can't recall all of the 06:

13 underlying circumstances to fill that information 06:

14 in, correct? 06:

15 A That's correct. 06:

16 Q Is that true of every change, not just 06:

17 the ones we have looked at? 06:

18 A I would have to say yes. I can't say 06:

19 100 percent what would be really -- I know for a 06:

20 fact that I did some that were wrong, and I did 06:

21 some that were right. But I can't say which ones 06:

22 are which without going back in time and looking 06:

23 at it and being there. 06:

24 MS. MCCLAIN: May I have this marked as next 06:

25 in order, please. 06:

1 I always needed to cover up on -- I felt like 06:

2 these were mistakes that I made in not being a 06:

3 good manager, I guess, of a store. 06:

4 Q Every time you did that, did you say to 06:

5 yourself, boy, I hope I don't get caught, I'm 06:

6 violating company policy? 06:

7 A I don't remember. 06:

8 Q Did you have that thought on occasion, 06:

9 "I hope I don't get caught"? 06:

10 A No. I think afterwards -- I remember at 06:

11 one time thinking -- having a really bad feeling 06:

12 of what I was doing, but I don't remember. 06:

13 Q Because you knew every time you made a 06:

14 change that interfered with an employee's work or 06:

15 misrepresented when they took lunch, that you 06:

16 were violating company policy, correct? 06:

17 A Correct. 06:

18 Q Would you turn to Lisa Murphy, please? 06:

19 A Okay. 06:

20 Q On 9/28. Ms. Murphy has filled out the 06:

21 Time Clock Worksheet for 9/28, correct? 06:

22 A Uh-huh. 06:

23 Q Were you using the Time Clock Worksheet 06:

24 to guide your punch edits for 9/28? 06:

25 A Looks like it's pretty straightforward. 06:

1 STATE OF CALIFORNIA)

2 COUNTY OF SONOMA)

3 I, LINDA VACCAREZZA, a Certified Shorthand
4 Reporter of the State of California, duly
5 authorized to administer oaths pursuant to
6 Section 2025 of the California Code of Civil
7 Procedure, do hereby certify that

8 JOHN D. HANSEN,

9 The witness in the foregoing examination,
10 was by me duly sworn to testify the truth, the
11 whole truth and nothing but the truth in the
12 within-entitled cause; that said testimony of
13 said witness was reported by a disinterested
14 person, and was thereafter transcribed under my
15 direction into typewriting and is a true and
16 correct transcription of said proceedings.

17 I further certify that I am not of counsel
18 or attorney for either or any of the parties in
19 the foregoing examination and caption named, nor
20 in any way interested in the outcome of the cause
21 named in said caption.

22 Dated the 14th day of November, 2007.

23
24 _____
25 LINDA VACCAREZZA, RPR, CSR #10201

Preferred Reporters
201 E. Watmaugh Road
Sonoma, California 95476

November 15, 2007

To: John D. Hansen
EDGAR LAW FIRM
ATTENTION:: JEREMY R. FIETZ, ESQUIRE
408 College Avenue
Santa Rosa, CA 95401

Re: Cruz, Hansen v. Dollar Tree Store
Deposition taken on November 1, 2007
Reported by Linda Vaccarezza

Dear Mr. Hansen,

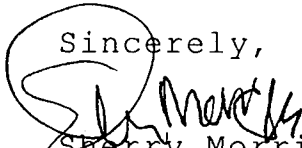
The original transcript of your deposition taken in the above-entitled action has been prepared and is available at this office for your reading; correcting and signing.

You may wish to discuss this matter with your attorney to determine if counsel requires that the original transcript of your deposition be read, corrected and signed by you before it is sealed.

Your rights regarding signature of this deposition are contained in the California Code of Civil Procedure.

If you wish to make arrangements to review the original transcript of your deposition, please contact this office during office hours, 9:00 to 5:00 Monday through Friday, to make an appointment to review the original transcript.

Sincerely,


Sherry Morrison
Office Manager

cc: All Counsel

EXHIBIT E

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

--oOo--

MIGUEL A. CRUZ, and JOHN
D. HANSEN, individually
and on behalf of all
others similarly
situated,

Plaintiffs, Case No. C07-02050 SC

vs.

DOLLAR TREE STORES, INC.,

Defendant.

DEPOSITION OF MIGUEL A. CRUZ

DATE: FRIDAY, OCTOBER 12, 2007

TIME: 9:32 A.M.

LOCATION: Kauff, McClain & McGuire
One Post Street, Suite 2600
San Francisco, California

PREFERRED REPORTERS
Certified Shorthand Reporters
201 E. Watmaugh Road
Sonoma, California 95476
707-938-9227

REPORTED BY: Wendy L. Van Meerbeke, CSR #3676

1 assistant managers; correct?

2 A. No.

3 Q. Who else worked overtime?

4 A. Sometimes stockers.

5 Q. Did the stockers ever work more than eight
6 hours?

7 A. Yes.

8 Q. Did some of your employees get overtime?

9 A. No.

10 Q. None of your employees in the Healdsburg
11 store ever got overtime; is that right?

12 A. No -- yes.

13 Q. Let's be very clear about this. It's your
14 testimony that while you were store manager at
15 Healdsburg, no one got a single penny of overtime?

16 A. I never checked their check, so I don't
17 know.

18 Q. But you think you went in and changed
19 every possible overtime hour; is that right?

20 A. Yes.

21 Q. Must have taken a lot of time for you to
22 do that.

23 MR. FIETZ: That's not a question.

24 Miguel, you don't have to answer.

25

1 Q. Yes?

2 A. Yes.

3 Q. Ms. Cape got overtime for 9-18; correct?

4 A. I don't remember.

5 Q. The hours would suggest she got overtime;

6 wouldn't they?

7 A. Yes.

8 Q. And you made no changes which got rid of

9 the overtime; correct?

10 A. Yes.

11 Q. So your testimony is that you always
12 changed everyone's punches to deprive them of
13 overtime was not truthful; was it?

14 A. I made a mistake.

15 MR. FIETZ: Argumentative.

16 MS. McCLAIN:

17 Q. You made a mistake?

18 A. Yeah.

19 Q. Just one? This is the only time where
20 we're going to find that somebody got overtime at
21 store 2262; is that correct?

22 MR. FIETZ: Objection. Argumentative,
23 lacks foundation.

24 THE WITNESS: I don't know.

25

1 Q. We see on October 1, 2006 that Ms. Rose

2 started work at 7:34 in the morning; correct?

3 A. Yes.

4 Q. And she ended work at 2200, which is

5 o'clock; correct?

6 A. Yes.

7 Q. Ms. Rose got overtime for that day; didn't

8 she?

9 A. Yes.

10 Q. And you supplied punches because Ms. Rose

11 didn't punch end breaks, start breaks and lunches,

12 correct, but you didn't change her hours? She got

13 the overtime; didn't she?

14 A. 10-22 -- what was the date?

15 Q. 10-1.

16 A. 10-1.

17 Q. The shift started at 7:34 a.m. and ended

18 at 11:00 o'clock p.m.

19 A. Yes.

20 Q. How many times do you think we're going to

21 find in the punch audit reports people who worked

22 over eight hours and there were no changes?

23 A. I don't know.

24 Q. Why did you allow overtime on these days

25 if -- the two days we've just looked at if

1 Is it correct that assistant managers were
2 not to assign overtime to employees without
3 approval from you?

4 A. Nobody should be allowed, not even me.

5 Q. No one should be allowed to sign overtime;
6 correct?

7 A. No.

8 Q. Was it a policy of Dollar Tree that under
9 no circumstances ever, ever, ever could you work
10 overtime -- could anyone work overtime?

11 MR. FIETZ: Objection. Vague.

12 MS. McCLAIN:

13 Q. Did you understand that Dollar Tree had
14 any policy one way or the other about hourly
15 employees working overtime?

16 A. No.

17 Q. You didn't understand that there was a
18 policy either prohibiting it or allowing it?

19 A. As far as I know, you're not supposed to
20 give overtime at Dollar Tree.

21 Q. How do you know that?

22 A. From Mr. Rick.

23 MS. McCLAIN: May I have this marked as
24 next in order, please?

25

1 A. Mr. Rick.

2 Q. How did Mr. Tellstrom tell Mr. Corina

3 that?

4 A. He will call me to tell him.

5 Q. Is it correct that every time we see a
6 change between the schedule and the actual worked,
7 that Mr. Tellstrom made that decision?

8 A. Yes.

9 Q. Every single time it appears in these
10 schedules?

11 A. Yes.

12 Q. And Mr. Tellstrom called you up and told
13 you that?

14 A. Yes.

15 Q. Did Mr. Corina get overtime for October
16 11th?

17 A. I don't remember.

18 MS. McCLAIN: May I have this marked as
19 next in order, please?

20 (A document was marked as Exhibit 59
21 for identification.)

22 MS. McCLAIN:

23 Q. If you look on the second page of this
24 document, Mr. Cruz, do you see a time period on
25 October 11th that corresponds with Mr. Corina's

1 schedule -- his actual work schedule?

2 A. Yes.

3 Q. So the actual time on Exhibit 36 says that

4 he started his shift at 10:49; correct?

5 A. Yes.

6 Q. And the actual time on that same punch

7 audit report says he ended at 8:05; correct? 2005

8 is 8:05?

9 A. Yes.

10 Q. So the numbers correspond precisely to

11 those listed on the actual work time on Exhibit 36;

12 correct?

13 A. Yes.

14 Q. He had apparently no breaks that day, so

15 he was paid for that whole time frame; correct?

16 A. Yes.

17 Q. So he got overtime that day; correct?

18 A. I would say I don't know.

19 Q. This reads as if he's entitled to

20 overtime; correct?

21 A. Yes.

22 Q. And you haven't changed any start shift or

23 end shifts which would deprive him of overtime;

24 correct?

25 A. No.

1 Q. So this is another example where you
2 didn't make a change that reduced an employee's
3 time so that they wouldn't get overtime; correct?
4 There's no change in these punches; is there?

5 A. No.

6 Q. Does this cause you to reconsider your
7 testimony, Mr. Cruz, that you changed everyone's
8 time so that no one ever got overtime?

9 A. No.

10 Q. You still think that testimony is
11 accurate?

12 A. Yes.

13 Q. Even in the face of now three examples
14 where people got overtime?

15 A. Yes.

16 Q. How do you explain that?

17 A. A mistake.

18 Q. A mistake on your part?

19 A. Yes.

20 Q. Letting that overtime slip by?

21 A. Yes.

22 Q. Did Mr. Tellstrom ever call you and say,
23 "I see that so-and-so got overtime. You didn't
24 change the punch audit report as you should have"?
25 A. Oh, yeah, for sure.

1 CERTIFICATION OF DEPOSITION OFFICER

2 I, WENDY L. VAN MEERBEKE, duly authorized to
3 administer oaths pursuant to Section 2093(b) of the
4 California Code of Civil Procedure, do hereby
5 certify that the witness in the foregoing
6 deposition was duly sworn by me to testify to the
7 truth in the within entitled cause; that said
8 deposition was taken at the time and place set
9 forth; that the testimony of said witness was
10 reported by me, a Certified Shorthand Reporter and
11 a disinterested person, and was thereafter
12 transcribed by computer under my direction into
13 booklet form; that the witness was given an
14 opportunity to read and correct said deposition and
15 to subscribe to the same.

16 I further certify that I am not of counsel or
17 attorney for either or any of the parties in the
18 foregoing deposition and caption named, nor in any
19 way interested in the outcome of the cause named in
20 said caption.

21 Dated the 1st day of November, 2007.

22 
23 WENDY L. VAN MEERBEKE, CSR 3676
24
25

Preferred Reporters
201 E. Watmaugh Road
Sonoma, California 95476
707-938-9227

October 31, 2007

TO: Miguel A. Cruz
c/o JEREMY R. FIETZ, ESQ.
408 College Avenue
Santa Rosa, California 95401

Re: Hansen v. Dollar Tree Stores
Deposition taken on October 12, 2007
Reported by Wendy Van Meerbeke, CSR #3676

Dear Mr. Cruz,

The original transcript of your deposition taken in the above-entitled action has been prepared and is available at this office for your reading, correcting and signing.

You may wish to discuss this matter with your attorney to determine if counsel requires that the original transcript of your deposition be read, corrected and signed by you before it is sealed.

Your rights regarding signature of this deposition are contained in the California Code of Civil Procedure.

If you wish to make arrangements to review the original transcript of your deposition, please contact this office during office hours, 9:00 to 5:00 Monday through Friday, to make an appointment to review the original transcript.

Sincerely,


Wendy L. Van Meerbeke
Certified Shorthand Reporter

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MIGUEL A. CRUZ, and JOHN D.)
HANSEN, individually, and on)
behalf of all others similarly)
situated,)
)
Plaintiffs,)
)
vs.) Case No: C07-02050 SC
)
)
DOLLAR TREE STORES, INC.,)
)
Defendant.)
_____)

DEPOSITION OF MIGUEL CRUZ
VOLUME II

DATE: Friday, November 2, 2007
TIME: 9:29 a.m.
LOCATION: Kauff, McClain & McGuire
One Post Street, 26th Floor
San Francisco, California 94104

PREFERRED REPORTERS
Certified Shorthand Reporters
201 E. Watmaugh Road
Sonoma, California 95476
707-938-9227

Reported By: Linda Vaccarezza, RPR, CSR #10201

1 A Yes.

2 Q The employee had punched a start break

3 at 12:51, correct?

4 A 12:51? I don't see 12:51. What day is

5 it?

6 Q It's the very first line on page 60,

7 9/23/2006.

8 A Yes.

9 Q The employee's punch is at 12:51,

10 correct?

11 A Yes.

12 Q You changed that punch to 13:50,

13 correct?

14 A Yes.

15 Q Why did you do that?

16 A I don't remember why.

17 Q It has no impact upon pay, correct, that

18 change?

19 A No.

20 Q Do you agree with that statement; that

21 change has no impact on pay, correct?

22 A Yes.

23 Q Why did you do it?

24 A I don't know.

25 Q Do you have any recollection? Did the

1 STATE OF CALIFORNIA)

2 COUNTY OF SONOMA)

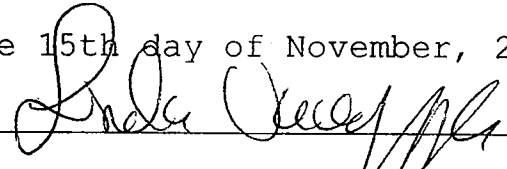
3 I, LINDA VACCAREZZA, a Certified Shorthand
4 Reporter of the State of California, duly
5 authorized to administer oaths pursuant to
6 Section 2025 of the California Code of Civil
7 Procedure, do hereby certify that

8 MIGUEL CRUZ,

9 The witness in the foregoing examination,
10 was by me duly sworn to testify the truth, the
11 whole truth and nothing but the truth in the
12 within-entitled cause; that said testimony of
13 said witness was reported by a disinterested
14 person, and was thereafter transcribed under my
15 direction into typewriting and is a true and
16 correct transcription of said proceedings.

17 I further certify that I am not of counsel
18 or attorney for either or any of the parties in
19 the foregoing examination and caption named, nor
20 in any way interested in the outcome of the cause
21 named in said caption.

22 Dated the 15th day of November, 2007.

23 
24 LINDA VACCAREZZA, RPR, CSR #10201
25

Preferred Reporters
201 E. Watmaugh Road
Sonoma, California 95476

November 15, 2007

To: Miguel Cruz
EDGAR LAW FIRM
ATTENTION: Jeremy R. Fietz, Esquire
408 College Avenue
Santa Rosa, CA 95401

Re: Cruz, Hansen v. Dollar Tree
Deposition taken on November 2, 2007
Reported by Linda Vaccarezza, CSR #10201

Dear Mr. Cruz,

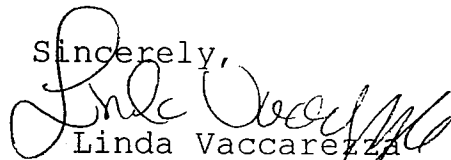
The original transcript of your deposition taken in the above-entitled action has been prepared and is available at this office for your reading, correcting and signing.

You may wish to discuss this matter with your attorney to determine if counsel requires that the original transcript of your deposition be read, corrected and signed by you before it is sealed.

Your rights regarding signature of this deposition are contained in the California Code of Civil Procedure.

If you wish to make arrangements to review the original transcript of your deposition, please contact this office during office hours, 9:00 to 5:00 Monday through Friday, to make an appointment to review the original transcript.

Sincerely,



Linda Vaccarezza
Certified Shorthand Reporter

cc: All Counsel

EXHIBIT F

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

---oOo---

KASSONDRA BAAS AND KELLY LOFQUIST,
individually and on behalf of all
others similarly situated,
Plaintiffs,

vs.

Case No. C0703108 JSW

DOLLAR TREE STORES, INC.,
Defendants.

DEPOSITION OF KELLY LOFQUIST

October 15, 2007

REPORTED BY:

SANDRA L. CARRANZA, CRR, RPR, CSR 7062

PREFERRED REPORTERS

CERTIFIED SHORTHAND REPORTERS

201 E. Watmaugh Road

Sonoma, California 95476

Phone (707) 938-9227

1 Q. Is it correct then that at least one of
2 your divorces was contested? There was testimony
3 taken about it?

4 A. No. I don't believe so. I don't remember.

5 Q. If they were not contested, that would mean
6 that you were testifying --

7 A. One of my marriages was annulled, so there
8 was no -- there was no court proceeding in that.

9 Q. Was that Mr. Kelley?

10 A. Mr. Albertony.

11 Q. If your divorces were not contested, is it
12 correct then that your testifying in court has been
13 restricted to criminal proceedings?

14 A. Yes.

15 Q. As far as you know, those criminal
16 proceedings have all been in California; is that
17 right?

18 A. They have all been in California.

19 Q. Have they all been in Sonoma County?

20 A. Yes.

21 Q. You told me that you and Ms. Baas discussed
22 unfair practices. And when I asked you what you
23 talked about, you said Tina being deprived of an
24 hour of work because Mr. Hansen wished to meet his
25 payroll hours, correct?

1 A. Right.

2 Q. Do you know that as a fact, or do you just

3 know that Mr. Hansen told you that?

4 A. I was sitting right there.

5 Q. You were sitting with him?

6 A. When he did it.

7 Q. Did you watch him do it?

8 A. Yes.

9 Q. So you saw him actually go into the Compass

10 report and make a change in Tina's hours; is that

11 right?

12 A. Yes.

13 Q. Did you say to him that's not right,

14 Mr. Hansen?

15 A. No.

16 Q. Why not?

17 A. I didn't want to lose my job.

18 Q. You knew Mr. Hansen had the authority to

19 fire you?

20 A. Yes.

21 Q. Did you know that what he was doing was

22 inconsistent with company policy, with Dollar Tree

23 policy?

24 A. I don't know.

25 Q. How did Mr. Hansen accomplish that task of

1 Q. Right.

2 Is there more than one number for human
3 resources?

4 A. I don't remember.

5 Q. Do you recall there being a care line
6 number as well, an anonymous line where you could
7 make reports?

8 A. Tip line, yeah.

9 Q. Tip line?

10 (Reporter clarification.)

11 MS. McCLAIN: Tip line.

12 Q. Do you know what Dollar Tree called that
13 tip line?

14 A. I don't remember.

15 Q. Did you ever call human resources to
16 complain about any change in your pay?

17 A. No.

18 Q. Why not?

19 A. I didn't want to complain and lose my job.

20 Q. You thought Mr. Hansen would have fired you
21 for that?

22 A. I thought, yeah, I might rock the boat and
23 get fired, yeah.

24 Q. My question is more specific than that.

25 Did you think Mr. Hansen would fire you for that,

1 clocking in and out for a 30-minute meal break even

2 when you didn't take them?

3 A. Yes.

4 Q. What did he say to that?

5 A. He didn't really have too much to say.

6 Q. You don't recall --

7 A. I don't recall what -- what our

8 conversation was, but I know we talked about it.

9 Q. Did you ever make an inquiry of anyone --

10 of human resources, of the tip line, of a manager --

11 as to what Dollar Tree's policies were with respect

12 to payment for time worked?

13 A. No.

14 Q. Did you ever inquire of anyone -- again,

15 human resources, a manager, the tip line -- as to

16 whether Dollar Tree expected you to accurately

17 record your hours worked?

18 A. No.

19 Q. Did you have a general understanding that

20 it was your obligation to accurately record your

21 hours worked?

22 A. Yes.

23 Q. Where did you get that understanding from?

24 A. Prior -- previous employment.

25 Q. Did you always punch in when you arrived at

1 once; is that right?

2 A. Yes.

3 Q. Do you have any information whatsoever that
4 this situation, having people work when they weren't
5 punched in or punched out, entering meal periods,
6 deducting overtime, do you have any factual
7 information that that occurred at any other store
8 aside from 1868?

9 A. No.

10 Q. Do you have any factual information that
11 suggests to you that Mr. Hansen was doing this
12 because some higher manager told him to do it?

13 A. Just hearsay.

14 Q. You don't have any direct factual
15 information about that; is that right?

16 A. No.

17 Q. You never heard another manager tell him
18 that. Mr. Hansen never said, well, I'm just doing
19 this because so and so told me to do it. You don't
20 have any direct accounting of that?

21 A. Just John telling me.

22 Q. So your information is John telling you; is
23 that right?

24 A. Yes, hearsay from him.

25 Q. Do you have --

1 how the district manager bonus was calculated?

2 A. No, I don't.

3 Q. You had a bonus as an assistant manager,

4 correct?

5 A. Once.

6 Q. That was based upon sales?

7 A. Yes.

8 Q. So if the store sales improved, managers at

9 the store level got bonuses, correct?

10 A. Correct.

11 Q. Did you have any factual information that

12 your bonus was related in any way to payroll hours?

13 A. No.

14 Q. Is that the case with Mr. Hansen as well?

15 Was his bonus based on the same criteria as yours,

16 or do you know?

17 A. I don't know.

18 Q. You never saw an e-mail that said, don't

19 pay people for time worked, did you, from

20 Mr. Tellstrom?

21 A. No.

22 Q. So the only e-mails you saw that gave you

23 any information was the e-mails that said, let's

24 keep employee hours in line with sales projections?

25 A. Yes. Or we are going to owe him.

1 Q. Can you tell me whether it was a day later

2 or two days later or three days later?

3 A. It was one to two days later.

4 Q. On this occasion you did not punch in?

5 A. No.

6 Q. Is that right?

7 A. Correct.

8 Q. Did you tell Mr. Hansen that you hadn't

9 punched in?

10 A. Yes.

11 Q. What did he say?

12 A. Good.

13 Q. Were there any witnesses to either of those

14 conversations with Mr. Hansen? To your knowledge,

15 did anyone overhear?

16 A. My son. He was one of the temporary hired.

17 Q. Is that Daniel?

18 A. Yes.

19 Q. We will find that there was a

20 Daniel Patrick on the payroll for some time in the

21 Christmas season of 2006; is that right?

22 A. Correct.

23 Q. For a couple of days?

24 A. Yes.

25 Q. And the first such day that he was on the

1 payroll is the occasion of the first such instance;

2 is that right?

3 A. Correct.

4 Q. It was your observation that Daniel heard

5 Mr. Hansen both express regret that you had punched

6 in on the first occasion and express pleasure that

7 you had not punched in on the second occasion; is

8 that right?

9 A. I don't know if he overheard it. I know he

10 was there.

11 Q. I asked you whether you thought there were

12 any witnesses to the conversation. Is your answer,

13 maybe Daniel, you're not sure?

14 A. No, he was there.

15 Q. The question is whether he heard the

16 conversation.

17 A. I don't know.

18 Q. My question really is, do you know whether

19 anyone was close enough to hear the conversation,

20 and your answer is you're not sure?

21 A. I don't know.

22 Q. But your son was there somewhere?

23 A. He was there right next to me.

24 Q. Did you talk to your son about this on any

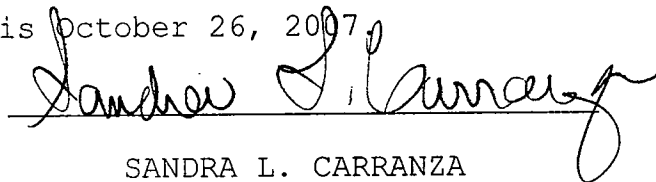
25 other occasion?

1 REPORTER CERTIFICATE

2 I hereby certify that the witness to the
3 foregoing deposition was by me duly sworn to testify
4 to the truth the whole truth and nothing but the
5 truth in the within-entitled cause; that said
6 deposition was taken at the time and place herein
7 named; that the deposition is a true record of the
8 witness's testimony as reported to the best of my
9 ability by me, a duly certified shorthand reporter
10 and a disinterested person, and was thereafter
11 transcribed under my direction into typewriting by
12 computer; that the witness was given an opportunity
13 to read and correct said deposition and to subscribe
14 the same. Should the signature of the witness not
15 be affixed to the deposition, the witness shall not
16 have availed himself or herself of the opportunity
17 to sign or the signature has been waived.

18 I further certify that I am not
19 interested in the outcome of said action, nor
20 connected with, nor related to any of the parties in
21 said action, nor to their respective counsel.

22 IN WITNESS WHEREOF, I have hereunto set
23 my hand this October 26, 2007.

24 

25 SANDRA L. CARRANZA
CSR No. 7062

PREFERRED REPORTERS
CERTIFIED SHORTHAND REPORTERS
201 E. Watmaugh Road
Sonoma, California 95476
Phone (707) 938-9227

October 26, 2007

TO: KELLY LOFQUIST
C/O: JEREMY R. FIETZ, ATTORNEY AT LAW
EDGAR LAW FIRM
408 College Avenue
Santa Rosa, California 95401


RE: KASSONDRA BAAS AND KELLY LOFQUIST, individually
and on behalf of all others similarly situated
vs. DOLLAR TREE STORES, INC.
Deposition taken October 15, 2007
Reported by SANDRA L. CARRANZA, CSR No. 7062

Dear Ms. Lofquist:

The original transcript of your deposition taken in the above-entitled action has been prepared and is available at this office for your reading, correcting and signing. In the alternative, you may wish to review your counsel's copy. Please notify this office and all counsel of any corrections you wish to make.

Your rights regarding signature of this deposition are contained in the California Code of Civil Procedure Section 2025.520. Unless otherwise directed, your original deposition transcript will be sealed after 35 days.

If you wish to make arrangements to review the original transcript of your deposition, please contact this office during office hours, 9:00 to 5:00 Monday through Friday, to make an appointment.

Sincerely,

Sandra L. Carranza
CSR No. 7062

cc: All counsel

EXHIBIT G

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

---oOo---

KASSONDRA BAAS AND KELLY LOFQUIST,
individually and on behalf of all
others similarly situated,

Plaintiffs,

vs.

Case No. C0703108 JSW

DOLLAR TREE STORES, INC.,

Defendants.

DEPOSITION OF KASSONDRA BAAS

October 17, 2007

REPORTED BY:

SANDRA L. CARRANZA, CRR, RPR, CSR 7062

PREFERRED REPORTERS
CERTIFIED SHORTHAND REPORTERS
201 E. Watmaugh Road
Sonoma, California 95476
Phone (707) 938-9227

1 Mr. Hansen's attention?

2 A. Yes. No. I don't know if I advised her of
3 that.

4 Q. Did you advise her to call payroll?

5 A. The only thing I advised her was to check
6 her pay stubs.

7 Q. So your answer was no, you did not advise
8 her to call payroll, correct?

9 A. Right.

10 Q. Did you advise her to call human resources?

11 A. No.

12 Q. Did you know, at that time, that there was
13 a Dollar Tree representative in California?

14 A. Like Candace?

15 Q. Yes.

16 A. Yes.

17 Q. You're speaking of Candace Camp?

18 A. Yes, I'm sorry.

19 Q. How did you know that Candace was a human
20 resources employee?

21 A. Because the time period from April until,
22 possibly, July or August -- from possibly June,
23 maybe -- no. July or August, when I was still
24 getting \$7.35 an hour, I had e-mailed Candace Camp
25 about my increase in pay, unknowingly or not

1 thinking we didn't have a store manager to correct
2 all that, so I e-mailed Candace Camp, and she then
3 talked to Mike Cossolotto, who, at the time, was the
4 district manager, and then they sent me a retro,
5 retro pay for the increase in wages from the time
6 period of April 2006 to whatever my current --
7 whatever the current month was that I e-mailed.

8 Q. If I understand your answer, there was a
9 time when you did not get the increase after you had
10 been promoted, you e-mailed Candace Camp and said, I
11 want the increase, or what's going on here, or words
12 to that effect; she handled the matter and made sure
13 that you got the assistant manager pay retroactive
14 to when you started in that position?

15 A. Correct.

16 Q. So your one encounter with human resources
17 at Dollar Tree found the function to be effective,
18 correct, it took care of the problem that you
19 raised?

20 A. Right. I e-mailed -- I e-mailed Candace a
21 few times on that matter and my status as an
22 assistant manager.

23 Q. Did you keep these e-mails?

24 A. No. Sorry. I -- I wasn't aware that I
25 could.

1 A. With regard to that message, no.

2 Q. I understand that you had made Care Line

3 reports but not on that topic; is that right?

4 A. Right.

5 Q. Am I correct that the Care Line is a phone

6 that you can -- a phone number that you call to make

7 any complaint or voice any concern you have, at all,

8 about Dollar Tree?

9 A. Employee and/or customers.

10 Q. How many times did you call the Care Line?

11 A. A few.

12 Q. Did you call using your name, or did you

13 make anonymous calls?

14 A. Both.

15 Q. Tell me all that you recall and what the

16 topics were, please.

17 A. With regard to John Hansen and the

18 overtime. I made calls and stated that there was

19 things going on around the store that needed -- that

20 needed attention or looking into.

21 Q. Did you ever, specifically, mention that

22 overtime wasn't being paid, or did you just,

23 generally, say things needed to be looked into?

24 A. I generalized.

25 Q. I want to be very clear that I understand

1 superior, "Hey, dude, you know, watch your step,"

2 or, you know, "Fix yourself."

3 I just wasn't aware if that was something

4 that, as an assistant, I could go to a store manager

5 and say.

6 Q. You had told us on one occasion, leaving a

7 message for Mr. Cossolotto that you have described.

8 Is that the only conversation, communication,

9 e-mail, any sort of communication that you had with

10 Mr. Cossolotto with respect to overtime issues?

11 A. I believe so.

12 Q. Did you ever have a communication with

13 Mr. Tellstrom with respect to overtime issues?

14 A. With respect overtime, specifically?

15 Q. Yes.

16 A. No.

17 Q. So you never communicated in any way to

18 Mr. Tellstrom a concern that Mr. Hansen was reducing

19 overtime from people's time records; is that right?

20 A. Specifically, no.

21 Q. Is that correct?

22 A. I mean, yes.

23 Q. When you said "Specifically, no," you're

24 saying, I never specifically said anything about

25 overtime to Mr. Tellstrom; is that correct?

1 A. I think one time face-to-face.

2 Q. How were the other communications

3 accomplished?

4 A. Over the phone.

5 Q. On each of those occasions, Mr. Tellstrom

6 would say, "What are you talking about? Give me

7 some details," something along those lines?

8 A. Right. He would -- he would want to talk

9 with me about it, but I didn't feel comfortable --

10 Q. Again, so we're talking about --

11 A. -- telling him specifics --

12 Q. I'm sorry. I will take responsibility for

13 that one.

14 Is the reason why you didn't give

15 Mr. Tellstrom any further details your lack of

16 comfort with talking about your supervisor, or is

17 there some other reason?

18 A. That's part of it. Keeping my job. I

19 didn't want to lose my job, and I was afraid that if

20 I "ratted out my boss," that I would be out soon

21 myself of a job.

22 Q. Is that because you thought Mr. Hansen had

23 the power to make the decision to terminate you?

24 A. Yeah.

25 Q. You knew that what he was doing was against

1 company policy, correct?

2 A. I thought, yeah.

3 Q. So why would you be afraid about losing

4 your job for reporting some conduct that was against

5 company policy?

6 A. I don't know. I was just afraid.

7 Q. Did Mr. Tellstrom try to get you to give

8 him the information?

9 A. He did.

10 Q. Aside from the specifics that you have now

11 told me about that you recall, and that is the

12 specific with regard to Ms. Kosinski and the two

13 other specifics with regard to Ms. Pinole -- was

14 that her last name?

15 A. Pinola.

16 Q. Pinola?

17 A. I wanted to go back that one.

18 Q. Sure.

19 A. Because I don't -- I'm trying to remember

20 if it was Matthew was the .20, or if it was myself

21 that had the .20.

22 Q. You're not sure that Matthew was involved

23 in this?

24 A. Right. I am not for sure. I'm not

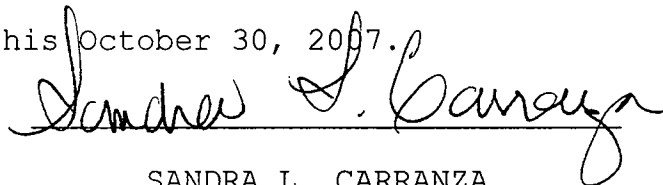
25 positive that it was Matthew that had the .20 or if

1 REPORTER CERTIFICATE

2 I hereby certify that the witness to the
3 foregoing deposition was by me duly sworn to testify
4 to the truth the whole truth and nothing but the
5 truth in the within-entitled cause; that said
6 deposition was taken at the time and place herein
7 named; that the deposition is a true record of the
8 witness's testimony as reported to the best of my
9 ability by me, a duly certified shorthand reporter
10 and a disinterested person, and was thereafter
11 transcribed under my direction into typewriting by
12 computer; that the witness was given an opportunity
13 to read and correct said deposition and to subscribe
14 the same. Should the signature of the witness not
15 be affixed to the deposition, the witness shall not
16 have availed himself or herself of the opportunity
17 to sign or the signature has been waived.

18 I further certify that I am not
19 interested in the outcome of said action, nor
20 connected with, nor related to any of the parties in
21 said action, nor to their respective counsel.

22 IN WITNESS WHEREOF, I have hereunto set
23 my hand this October 30, 2007.

24 

25 SANDRA L. CARRANZA
CSR No. 7062

PREFERRED REPORTERS
CERTIFIED SHORTHAND REPORTERS
201 E. Watmaugh Road
Sonoma, California 95476
Phone (707) 938-9227

October 30, 2007

TO: KASSONDRA BAAS
C/O: JEREMY R. FIETZ, ATTORNEY AT LAW
EDGAR LAW FIRM
408 College Avenue
Santa Rosa, California 95401

RE: KASSONDRA BAAS AND KELLY LOFQUIST, individually
and on behalf of all others similarly situated
vs. DOLLAR TREE STORES, INC.
Deposition taken October 17, 2007
Reported by SANDRA L. CARRANZA, CSR No. 7062

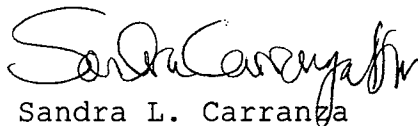
Dear Ms. Baas:

The original transcript of your deposition taken in the above-entitled action has been prepared and is available at this office for your reading, correcting and signing. In the alternative, you may wish to review your counsel's copy. Please notify this office and all counsel of any corrections you wish to make.

Your rights regarding signature of this deposition are contained in the California Code of Civil Procedure Section 2025.520. Unless otherwise directed, your original deposition transcript will be sealed after 35 days.

If you wish to make arrangements to review the original transcript of your deposition, please contact this office during office hours, 9:00 to 5:00 Monday through Friday, to make an appointment.

Sincerely,



Sandra L. Carranza
CSR No. 7062

cc: All counsel